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March 15, 2016

**VIA ECF**

M. Judge Arlene R. Lindsey  
U.S. District Court – EDNY  
814 Federal Plaza  
Central Islip, New York 11722

**Re: Tatiana Herdocia et al v. Southern Wine & Spirits of America, Inc. et al**  
**Case No. 14-CV-3196 (DRH)(ARL)**  
***Joint Status Report – Second Request for Extension of Time for Mediation***

Dear Judge Lindsay:

Please be reminded that I represent the Plaintiffs in the above-referenced matter. Due to circumstances beyond the control of the parties, I write this joint status report making a second request for a stay of discovery and extension of time to mediate this matter.

On February 3, 2016, Your Honor granted our request to extend the stay of discovery and time to mediate this matter. The parties selected a mediator and scheduled mediation for Monday, March 14, 2016. On March 7, 2016, the mediator informed the parties that he due to an emergency, he would not be available for the March 14, 2016 mediation. Since then, the parties and the mediator's office have been in constant communication trying to select a date convenient to all parties involved.

The parties are very much interested in mediating this matter. Although this is our second request for an extension, the request is due to no fault of the Plaintiffs, Defendants or their respective counsel. We are hopeful to have the mediation by the end of March 2016; however, counsel for Southern Wine & Spirits of America, Inc. and the undersigned are waiting to hear from union's counsel as to his client's availability on the dates suggested by the mediator.

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Respectfully submitted,

*Jose G. Santiago*

Jose G. Santiago, Esq.